

Pesticide Recordkeeping Requirements for Commercial & Non-commercial Applicators

In South Carolina, commercial and non-commercial pesticide applicators may be required to maintain records on their pesticide applications under more than one regulation. Each of these regulations requires that information or records be kept on a per application basis. A given application may be affected by more than one of these regulations. You must consult the regulations and individual pesticide labels for complete information.

South Carolina Pesticide Control Act (SCPCA)

SCPCA covers the sale and use of all pesticides registered in South Carolina. These requirements for Commercial applicators go into effect on January 1, 2006.

- Each company or firm employing licensed commercial or noncommercial pesticide applicators must keep application records of all pesticides (herbicides, insecticides, etc.), either general or restricted use.
- Each record must include:
 - the quantity of each pesticide used, received, or purchased,
 - the common chemical name of the active ingredient(s) (not the product name),
 - the pest or purpose for which the pesticide was applied, [It is not necessary to list the pests involved for general household insect control or for general insect control measures in commercial and industrial establishments. In these cases the record may indicate merely "household pests" or "general insect control"] and
 - the date and place of each application.

- Commercial Applicators must provide copies of application records to clients within 30 days of an application of a Restricted Use Pesticide (RUP).
- In the application of termiticides, for each termite treatment made, the appropriately licensed business must record required information on the Dept. of Pesticide Regulation's (DPR) "Record of Termiticide Use in South Carolina" form, or in a similar manner approved by the DPR. These treatment records require more detailed information than other application records, especially with respect to the application site, and amounts of pesticide product and finished dilutions used. Each record is to be kept for the required time period or for the length of any contract or warranty, whichever is longer. The form is available from DPR offices or from their web site: <http://dpr.clemson.edu/Forms/>.

USDA Federal Pesticide Recordkeeping Requirement

The Federal Food, Agriculture, Conservation and Trade Act (FACT) spells out recordkeeping requirements for Private pesticide applicators.

- Certified Commercial Applicators must provide a copy of records of Restricted-use pesticide applications to the persons for whom the Restricted-use pesticides were applied within 30 days.

EPA's Worker Protection Standard (WPS)

- The WPS does NOT have a recordkeeping requirement as such. However, it DOES require that certain information on individual pesticide applications be displayed for a specified time period: the Restricted Entry Interval (REI) of the pesticide +30 days.
- Commercial handler (applicator) employers must inform their customer—the operator of the farm, forest operation, nursery, or greenhouse—about:
 - the specific location and description of the area(s) on the agricultural establishment that are to be treated with a pesticide,
 - time and date the pesticide is scheduled to be applied, product name,
 - EPA registration number, and active ingredient(s),
 - restricted-entry interval for the pesticide,
 - whether the pesticide labeling requires both treated-area posting and oral notification, and
 - any other specific requirements on the pesticide labeling concerning protection of workers and other persons during or after application.

Recordkeeping Tips & Additional Information

- Additional information on specific pesticide applications may be requested for related medical treatments, pesticide emergencies, or by customers/ clients under pesticide regulations.
- The USDA and some commercial companies have paper forms and software to assist you in your recordkeeping. Records for the various regulations do not have to be kept individually; you can keep a single, comprehensive set of application records, provided that you keep all required data elements. The records can be on paper, or in a computer file, or both.
- Under the SC Pesticide Control Act, the SC Backflow Prevention, Chemigation Act, and the USDA Federal Pesticide Recordkeeping Requirement, records must be maintained for two (2) years from the date of the application. Again, the WPS does not require application records to be maintained after the required display period.



- Tip: The recordkeeping regulations above vary in which of the pesticide identifiers they require, but because you may be required to display information or keep pesticide application records under more than one regulation, use all three pesticide identifiers any time you record application information. That way, you don't have to worry about which regulation you are keeping records for. They are all found on the pesticide label.

The three (3) identifiers are:

1. The BRAND (Trade) or PRODUCT name,
2. The COMMON CHEMICAL name (active ingredient name), and
3. The EPA Registration No.

- Tip: Sometimes the pesticide label does not have the common chemical name of the active ingredient on it, rather, it has the full chemical name. You can often find the common chemical name on the Material Safety Data Sheet (MSDS) for the product.

An example: A pesticide product called "FURY INSECTICIDE" lists the active ingredient name on its label as: S-Cyano (3-phenoxyphenyl)methyl (+,-) cis/trans 3-(2,2-dichloroethenyl)-2,2 dimethylcyclopropane carboxylate. The MSDS provides, in addition to the chemical nomenclature, the common chemical name, in this case, zeta-cypermethrin.

- Tip: Good application records not only meet regulatory requirements but provide information you can use to trouble-shoot application/control problems, or to duplicate control successes. You should keep any additional information in your records that would be useful to YOU, including weather information, such as temperature, wind speed and direction, etc.; method of application; nozzle tip size; spray pressure; application rate; ground speed; boom height; drop-spreader settings; etc.

An example: If a pesticide label instructs you to "Apply only when the wind speed is less than 10 mph. wind speed must be measured adjacent to the application site on the upwind side, immediately prior to the application," you should not only make this measurement, but record it in your application record.

- More detailed information on pesticide recordkeeping is available from your county Extension Pesticide Training Coordinator, the Department of Pesticide Regulation or the Clemson University Pesticide Information Program web site under Safety Education Topics:

http://www.clemson.edu/extension/pest_ed/